

United States District Court for the Western District of Texas  
Austin Division

Fatiha Haouass	§	
Plaintiff,	§	
	§	Case no. 1:22-cv-855
v.	§	
	§	
Terry Turner,	§	
Defendant.	§	

**Complaint**

**I. Parties**

1. Fatiha Haouass brings this wrongful death lawsuit against Terry Turner for his shocking execution-style killing of her 31-year-old son, Adil Dghoughi, on a quiet neighborhood street in Martindale.

2. Fatiha is a citizen of Morocco, and she lives in Rabat, Morocco.

3. On Oct. 11, 2021, Terry Turner shot Fatiha's son Adil point-blank in the head after Adil pulled over outside Turner's house to look for directions on his phone.

4. Turner is under indictment for First Degree Murder in Caldwell County's 421st District Court.

**II. Jurisdiction**

5. This Court has federal question subject matter jurisdiction over this diversity case under 28 USC § 1332(a)(2) because the amount in controversy exceeds \$75,000, Plaintiff is a Moroccan citizen residing in Morocco, and Defendant is a Texan.

6. This Court has general personal jurisdiction over Turner because he lives in Texas.

7. This Court has specific personal jurisdiction over Turner because he killed Adil in Texas.

**III. Venue**

8. Under 28 U.S.C. § 1391(b), the Western District of Texas is the correct venue for this lawsuit because Turner shot and killed Adil in Caldwell County in the Western District.

**IV. Facts**

**A. About Adil**

9. Adil was born on December 27, 1989.

10. He was his mother's first son, which is a very special thing in their culture.



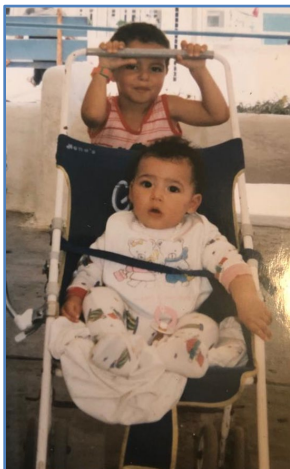
Baby Adil and Fatiha

11. Adil was the oldest of his four siblings, which is also a very special thing in Moroccan culture.

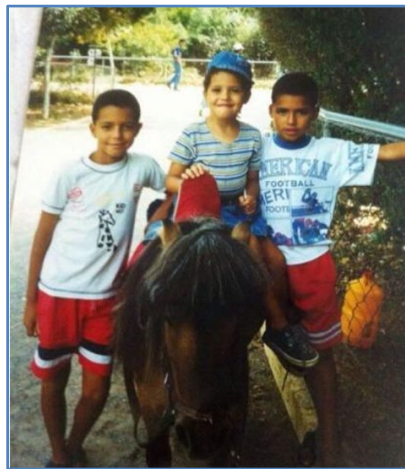
12. Adil helped care for his siblings as children when their parents were working and he continued to guide and care for them as young adults.

13. Adil helped his mother Fatiha and fulfilled his role as the oldest sibling by counseling and guiding his young adult brothers and sister. He gave them life advice and financial and emotional support.

14. Adil was his younger siblings' role model and Fatiha relied on him heavily for this.



Adil with baby brother Othmane



Adil and Othmane with little sister Basma

15. Adil obtained an MBA from Johnson & Wales University in Providence, Rhode Island in 2014.



Fatiha (second from left) celebrating Adil's (right) graduation

16. Adil's 29-year-old brother Othmane followed in his footsteps and also earned an MBA.



Adil (right) celebrating Othmane's (left) graduation

17. Adil's 26-year-old younger sister Basma is a licensed medical doctor, in training to become a radiologist.
18. Adil's youngest brother, Assil, is 20 years old and in college, studying economics. He also intends to follow in his big brother Adil's footsteps and pursue an MBA degree in the United States.
19. Adil was a proud American citizen.
20. He paid his bills.
21. He paid his taxes.
22. He was a good citizen.
23. Adil loved life.



twin grins



Adil and Fatiha

24. He was always smiling.



Left to right: Adil, Aunt Hafida, Fatiha, and Othmane

25. Adil fit seamlessly into American society and culture.
26. His close friends were from many races and backgrounds.
27. Adil shared his mother's passion of cooking and sharing delicious food with loved ones.



Adil cooking up msemen (Moroccan pancakes) for breakfast



Adil and Othmane smoking meats in their yard in College Station

28. Before he was killed, Adil was applying for MBA-level jobs in Austin.



29. Before he was killed, Fatiha had every expectation that Adil would receive a lucrative employment offer from a national or international corporation.

30. Before he was killed, Fatiha expected that Adil's successful professional future would support her in her retirement and as she aged.

31. Before he was killed, Fatiha expected that Adil would continue to support his young adult siblings emotionally and financially.

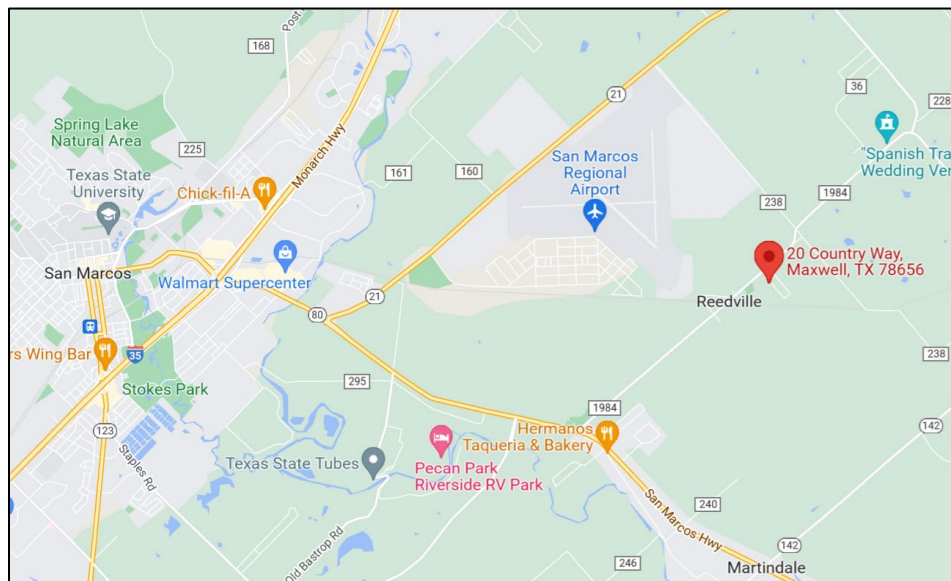


Adil (sunglasses) and Othmane with their mother Fatiha

#### **B. Adil's Senseless Killing**

32. On Oct. 11, 2021 at approx. 3:45 a.m. Adil was driving to his girlfriend's house in Maxwell, Texas.

33. Adil's girlfriend lives at 20 Country Way, in a small subdivision, right off FM 1984, adjacent to the San Marcos Regional Airport.



34. Adil made a wrong turn off the San Marcos Highway (Route 80) when he meant to turn onto FM 1984.



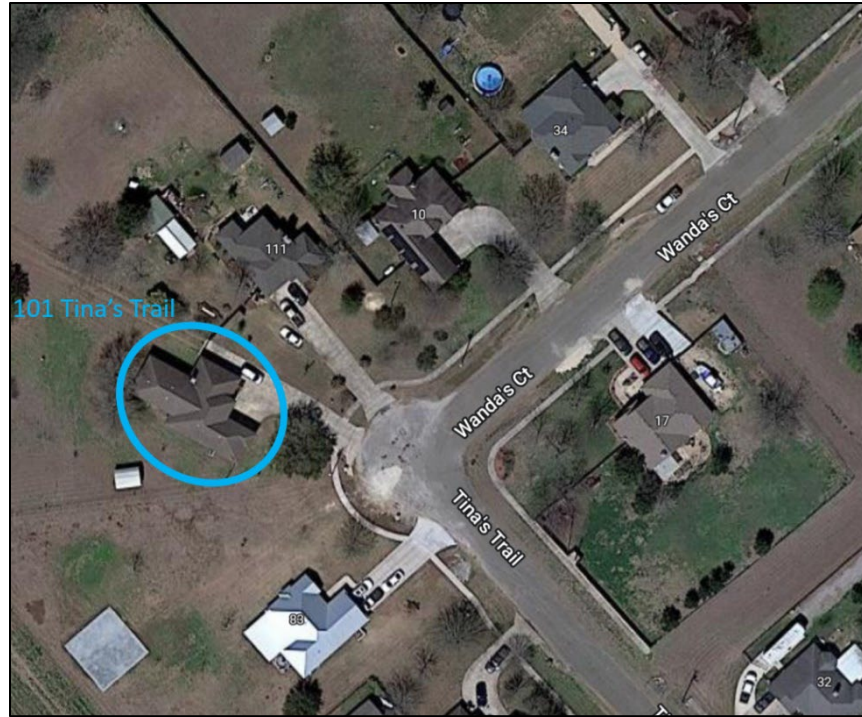
35. Adil was approximately half a mile south of FM 1984 when he made the wrong turn.

36. Realizing he was lost, Adil pulled over and stopped his car in the public right-of-way on Tina's Trail to look for directions on his phone.

37. Adil was only 3.2 miles—a five minute drive—from his destination.



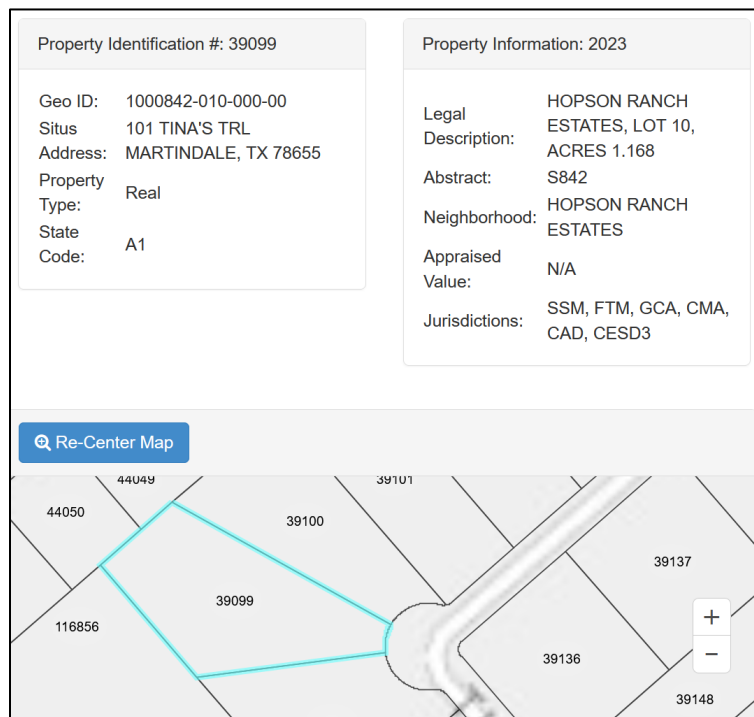
38. Adil's car was pulled over near the property line of 101 Tina's Trail, the residence of Terry Turner.



39. Terry Turner and his neighbors in the Hopson Ranch Estates subdivision have driveways that extend beyond their property lines and into the public right-of-way.

40. Terry Turner's driveway extends outside of his property, across the public sidewalk and into the public right-of-way.

41. Terry Turner does not own the sidewalk or the land inside the sidewalk.





42. Turner mistakenly believed that he owned the sidewalk and the driveway extending inside the sidewalk.

43. Turner mistakenly believed that Adil had parked his car on his property.

44. When Turner saw Adil's car idling *near* his driveway, he retrieved a gun from his bedroom and ran out his front door toward Adil brandishing his weapon.

45. When Adil saw a stranger running toward him with a gun, he fled for his life.

46. Adil quickly reversed and turned his car's front wheels slightly to the left so that his car was positioned to drive south on Tina's Trail.

47. Turner ran around the front of Adil's car as Adil turned the car in reverse.

48. Adil put his transmission in drive to flee from the armed man.

49. Terry Turner, having now run into the street, shot Adil point blank in the head through the closed driver-side window.

50. Turner called 911 and confessed to having shot Adil.

51. Law enforcement found Adil's car in the public right-of-way.

52. Adil's car was parked perpendicular to the end of Turner's driveway, with its front tires turned slightly to the left.



53. The windows were up, and the doors were locked.

54. Adil was inside with a single gunshot wound to his head.

55. Adil died at the Seton Hays Hospital the next day.



**V. Claim for Wrongful Death**

56. Terry Turner had no legal justification for shooting Fatiha's beloved oldest son. Turner's wrongful act caused Adil's death and caused Fatiha enormous mental anguish and trauma.

**VI. Damages**

Fatiha seeks recovery for all her damages including her loss of consortium with her beloved first-born son and her past and future mental anguish from losing her child in this horrific, violent way while he was in the prime of his life, pre and post judgment interest, attorney's fees, expenses, and costs.



**VII. Request for jury trial**

Fatiha requests a jury trial.

**VIII. Prayer**

For all these reasons, Fatiha Haouass requests that Terry Turner be summoned to appear and answer her allegations.

Respectfully submitted,  
/s/ Rebecca Webber  
Rebecca Webber  
Webber Law  
4228 Threadgill Street  
Austin, Texas 78723  
512-537-8833  
[rebecca@rebweblaw.com](mailto:rebecca@rebweblaw.com)

Attorney for Plaintiff Fatiha Haouass